

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION – DETROIT

In the matter of:

CITY OF DETROIT, MICHIGAN

Case No. 13-53846

Chapter 9

Debtor in Possession\_ /

Hon. STEVEN W. RHODES

CORRECTED OBJECTION TO AMENDED DISCLOSURE STATEMENT  
BY THE HOUSING IS A HUMAN RIGHTS COALITION

Note: filed on 4/1/2014 but stricken  
and promptly refiled under the correct event.

The Housing is a Human Rights Coalition submits to the Court:

1. Housing is a Human Rights Coalition (henceforth “HHRC” is interested in this matter as an independent coalition of realtors, lawyers, community activists, and low-income Detroit citizens which grew out of the Michigan Welfare Rights Organization following the Occupy Detroit movement in the summer of 2011.
2. HHRC delivered its request for input into the Disclosure Statement to the offices of Debtor’s counsel:
  - A. A copy of the Comments by HHRC are attached (Exhibit “1”)
  - B. A copy of the Response by Counsel for the Debtor-in-Possession is attached. (Exhibit “2”)
3. HHRC objects because of the failure of the Debtor in Possession to indicate the existence of the Nuisance Abatement Ordinance, Sections 37-2-1 to 37-2-9 of the City Charter (attached as Exhibit “3”), which is important to full and adequate disclosure under 11 USC § 1125(b).
4. HHRC objects because the Debtor in Possession fails to indicate it is not implementing the statute, allegedly for financial reasons. 11 USC § 1125(b).
5. HHRC objects because the Debtor in Possession fails to indicate all relevant pre-petition litigation which may bear on the success or failure of the plan. **In re Malek**, 35 B.R. 443 (Bank., E.D. Mich 1983) In this case the relevant litigation would be **Moore v. City of Detroit**, 159 Mich App 199, 406 NW 2<sup>nd</sup> 488 (1987), which requires the City to implement the Nuisance Abatement Ordinance.

6. HHRC objects to the Amended Disclosure Statement because it fails to give adequate information as to the likely success or failure of the plan in that it fails to reference or address the "People's Plan", adopted at a citizens' meeting. (Exhibit "4". While this is a political document, it proposes legislative and other actions which could improve the City's prospects of reorganization. And while the Court is neutral, Chapter 9 is inherently political and the various constituencies and classes of claimants have a right to act politically.

Wherefore HHRC prays the Court will deny approval of the Amended Disclosure Statement until the omissions are addressed.

FOR HOUSING IS A HUMAN RIGHT  
COALITION:

By: /s/ kurt thornbladh  
KURT THORNBLADH P25858  
Thornbladh Legal Group PLLC  
7301 Schaefer  
Dearborn, MI 48126  
(313) 943 2678  
[Kthornbladh@gmail.com](mailto:Kthornbladh@gmail.com)

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